

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

MDL NO. 3:16-md-2738-FLW-LHG

**JUDGE FREDA L. WOLFSON
MAG. JUDGE LOIS H. GOODMAN**

THIS DOCUMENT RELATES TO:

Civil Action No. 3:18-cv-04714-FLW-LHG

***ROBERT WORSHAM, et al. v.
JOHNSON & JOHNSON, et al***

UNOPPOSED MOTION TO FILE FIRST AMENDED COMPLAINT

Robert Worsham, as the Independent Administrator of the Estate of Nedra Worsham, moves the Court for an Order allowing him to file the First Amended Complaint correcting a typographically errors in his originally filed complaint on March 29, 2018 removing Defendants Imerys Talc and PCPC (Page 4), removing all Counts against Imerys Talc and PCPC (Pages 6-7) and correctly identifying Counts XIX: Loss of Consortium against all Defendants, XXII: Wrongful Death against all Defendants, and XXIII: Survival Action against all Defendants which were inadvertently left unchecked on his original complaint (Page 7).

1. A proposed First Amended Complaint correcting this error is attached hereto as **Exhibit A.**

2. Plaintiff's counsel has met and conferred with Defendants' counsel, who has indicated Defendants do not oppose the motion.

WHEREFORE, counsel for Plaintiff Robert Worsham respectfully requests that this Court grant this request and allow Plaintiff to file his First Amended Complaint.

DATED: February 3, 2021

Respectfully Submitted,

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